

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Piper Sandler & Co.,

Case No. 0:23-CV-2281

Plaintiff,

v.

DECLARATION OF WILLIAM
PATERSON

Constanza Gonzalez,

Defendant.

I, William Paterson, state as follows:

1. I am an attorney with Anthony Ostlund Louwagie Dressen & Boylan P.A., counsel to Plaintiff Piper Sandler & Co. in the above-captioned matter. I submit this declaration in support of Plaintiff's Motion for a temporary restraining order and preliminary injunction.

2. Attached as **Exhibit 1** is a true and correct copy of the Offer Letter executed by Ms. Gonzalez on December 15, 2021.

3. On June 30, 2023, after correspondence from Piper's clients and after Piper had conducted a preliminary forensic review of its system, Piper raised its concerns that Ms. Gonzalez did not intend to comply with her restrictive covenants and had already breached her agreement. Attached as **Exhibit 2** is a true and correct copy of the letter Piper sent to Davidson's General Counsel.

4. On July 3, 2023, in response to Piper's letter, Davidson provided an attestation from Gonzalez confirming that Gonzalez had taken Piper's confidential information but claiming that Gonzalez had destroyed the information and had never shared the information with Davidson. Attached as **Exhibit 3** is a true and correct copy of the letter Davidson sent to Piper.

5. On or about July 24, 2023, Piper requested, through Davidson, the passcode for the cellphone that Ms. Gonzalez had used while employed at Piper. Piper intended to open the cellphone to further track Ms. Gonzalez's misappropriation and use of Piper's confidential information. In response, Ms. Gonzalez, through Davidson, provided passcodes, but according to Piper's forensic expert, they were incorrect. Piper was only able to access Gonzalez's phone after subsequent forensic work by an expert forensic team engaged by Piper.

6. Attached as **Exhibit 4** is a true and correct copy of the FINRA BrokerCheck/CRD for Constanza Gonzalez showing that she has been registered with Davidson since June 26, 2023.

7. After hiring Gonzalez, Davidson celebrated the hire on its social media account.

I swear under penalty of perjury that everything that I have stated in this Declaration is true and correct.

Executed this 2nd day of August, 2023, in the City of Minneapolis,
Hennepin County, State of Minnesota.

s/William R. Paterson

William R. Paterson